

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**William X Nietzsche (solely as trustee for  
KRME International Trust),**

**Et al.,**

**3:18-CV-01930-SI**

**Plaintiff/Petitioner,**

Case No.

**PLAINTIFF'S MOTION FOR CONTEMPT**

**DATE: OCT 31, 2019**

**TIME: 10AM**

**ROOM: 300**

**v.**

**FREEDOM MORTGAGE CORPORATION (FMC),**

**Et al.,**

**Defendant(s)/Respondent(s)**

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**PLAINTIFF'S MOTION FOR CONTEMPT**

COMES NOW Plaintiff William and Julie Kinney ("The Kinney's"), by and through Plaintiff/trustee William X Nietzsche, a People, to move this Court of Record to enter an order finding the following persons (hereinafter contemnors) to be in either civil contempt and/or criminal contempt and/or misdemeanor contempt of the above-entitled court, and in support state the following:

1. This affidavit is presented to the court (and not to a judge) as described in California Code of Civil Procedure, Section 1211(a), paragraph 2.<sup>1</sup>

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<sup>1</sup> California Code of Civil Procedure, Section 1211(a), paragraph 2: "When the contempt is not committed in the immediate view and presence of the court, or of the judge at chambers, an affidavit shall be presented to the court or judge of the facts constituting the contempt, or a statement of the facts by the referees or arbitrators, or other judicial officers."

2. The following persons:

Michael Simon, purported judge;  
Mary Austad, purported clerk;  
Tom Purcell, purported attorney;  
Michael Ferrell, purported attorney;  
Andrew Wiener, purported attorney;  
Anthony Todaro, purported attorney;  
Alicia Morales, purported attorney;  
Rachel Evans, purported attorney;  
Teresa Armendariz, purported attorney;  
David Venables, purported attorney;  
James Bookhout, purported attorney;  
Kevin Kono, purported attorney;  
Cynthia Peek, purported attorney;  
Marc Katz, purported attorney;  
David J. Elkanich, purported attorney;  
Mathew J Kalmanson, purported attorney;  
Meryl Hutleng, purported attorney;  
Nathanial Aggrey, purported attorney;  
Cole L. Albee, purported attorney;  
Nellie Barnard, purported attorney;  
Kathy Kudrna, purported attorney;  
Peter Salmon, purported attorney;  
Pillar French, purported attorney;  
Milo Petranovich, purported attorney;  
Terrance Slominski, purported attorney;

(hereinafter "Contemnors") are all subjects of this court and shall be found to be in civil contempt, criminal contempt, and/or misdemeanor contempt of this court.

3. This motion is made on the grounds that said subjects of the court willfully conspired to, and did create and enter into the record of the above-entitled court a paper falsely purporting to be a duly constituted order of said court. The consequence of said paper is to interfere with the conduct of the business of the court, and subsequently the rights of the parties to orderly due process and the authority and dignity of the court.
4. Plaintiffs further move the court to issue such orders as may be necessary to enforce the rights of the parties and the authority and dignity of the court.
5. These motions are based on the pleadings, records and files of the court, and the attached declarations/affidavits of William X Nietzsche and Wren Doggett.


WHEREFORE, Plaintiffs move this Court of Record to enter an order:


1. Requiring Contemnors, to show cause, if any they have, why the court should not find each individually in contempt of court by reason of their attempt to circumvent a lawfully

issued subpoena, as alleged in Affidavit of William X Nietzsche in support of this motion for contempt;

2. or find Contemnors each individually in contempt of court by reason of their attempt to circumvent a lawfully issued subpoena, as alleged in Affidavit of William X Nietzsche in support of this motion for contempt;
3. Further, I invite the court to use its discretion to determine whether or not this court of record should send, in accordance with Ninth Circuit Local rule 6, a written notification of its finding to the Judicial Council for the Ninth Circuit and Oregon State Bar Association.
4. And any such other and further relief the court deems just and reasonable under the circumstances.

RESPECTFULLY DATED this 30 day of September, 2019.

By   
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By   
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

